

1 A. They work on everything. It  
2 could deal with applications, could deal with  
3 system configurations. You know, I haven't  
4 been in an operational role in, you know, 25  
5 years. So I'm not sure what else has changed.

6 MS. BOUCHARD: Again, he's not  
7 here as a 30(b)(6) deponent to testify  
8 to general industry standards.

9 MS. WALSH: I'm not asking him  
10 about general industry standards. I'm  
11 just laying a foundation with respect  
12 to questions specific to Mr. Millan.

13 MS. BOUCHARD: Well, he said he  
14 hasn't worked in that environment in  
15 20 years.

16 MS. WALSH: I'm going to ask  
17 him questions. If he can't answer  
18 them, I've already told him he can  
19 tell me that he doesn't know.

20 BY MS. WALSH:

21 Q. Is there an industrywide term  
22 that you recognize as a level-two  
23 network-support person?

24 A. We have a level two in

1 operations. It's just a higher skill set than  
2 level one.

3 Q. Okay. What's the higher skill  
4 set? What additional skills do they have  
5 above level-one personnel?

6 A. I'm not a hundred percent sure.

7 MS. BOUCHARD: And, again, I'm  
8 going to object to this line of  
9 questioning. If he hasn't been in  
10 this role in 20 years, his --

11 MS. WALSH: You have that on  
12 the record. I understand.

13 MS. BOUCHARD: Okay. Well,  
14 it's a continuing objection.

15 BY MS. WALSH:

16 Q. Do you recognize what a  
17 level-three support person is with respect to  
18 network technology?

19 A. Again, just like level two,  
20 it's an even higher skill set in the  
21 operations environment.

22 Q. And, again, do you know what  
23 higher skill set level threes would have over  
24 level twos?

1 A. No, not specifically.

2 Q. To get back to the lab  
3 coordinator position at the lab that Naseer  
4 currently has with Anthony Sorrentino --  
5 correct?

6 A. Correct.

7 Q. -- are either -- are they both  
8 on the same level in terms of title, or is one  
9 above the other?

10 A. I would -- Anthony's above  
11 Naseer.

12 Q. Does Naseer report to Anthony?

13 A. No, he does not.

14 Q. Do they have different titles?

15 A. Yes, they do.

16 Q. What are their different  
17 titles?

18 A. I believe Anthony's classified  
19 as an engineer, and I'm not a hundred percent  
20 sure what Naseer's title is.

21 Q. And other than their titles  
22 being different, is there anything else that  
23 indicates that Mr. Sorrentino is above  
24 Mr. Ibrahim?

1           A.       No. The only difference there  
2   is Anthony is seasoned. He's got years of  
3   experience, and he could provide additional  
4   guidance, support to Naseer.

5           Q.       Are there any qualifications  
6   that Mr. Sorrentino has above Mr. Ibrahim?

7           A.       Just experience.

8           Q.       Are there any certifications he  
9   has that Mr. Ibrahim does not have?

10          A.       Not that I'm aware of.

11          Q.       Are there any duties and  
12   responsibilities of the ones you listed for  
13   lab coordinator that Mr. Sorrentino has, but  
14   Mr. Ibrahim does not have?

15          A.       No.

16          Q.       So there's nothing that  
17   Mr. Ibrahim can't do that Mr. Sorrentino can  
18   do?

19          A.       Correct. They both share full  
20   responsibility of the lab. Both work on all  
21   the same stuff.

22          Q.       Now, you testified that one of  
23   the duties and responsibilities that  
24   Mr. Ibrahim and Mr. Sorrentino -- I'm going to

1 include the two of them now -- as lab  
2 coordinators --

3 A. Okay.

4 Q. -- is receiving equipment. Can  
5 you tell me what's involved in that?

6 A. Yes. If an engineer is going  
7 to evaluate or certify new products, those new  
8 products get delivered from the vendor to our  
9 shipping dock. The mailroom will then deliver  
10 them to the lab, and the lab coordinator's  
11 role is to receive that equipment, place it in  
12 a storage room and then work with the engineer  
13 to deploy and install that equipment in the  
14 right fashion.

15 Q. Okay. So you said install and  
16 deploy the equipment. What's specifically  
17 involved, in layperson's terms, in installing  
18 and deploying the equipment?

19 A. What they would do is unpack it  
20 if they need to, install it in a cabinet or  
21 freestanding frame, plug it in, connect up the  
22 network cables, the management cables and the  
23 surveillance cables that would allow the  
24 engineers to gain access to the equipment from

1 either outside the lab or from their desk.

2 Q. What are the management cables?

3 A. Just an Ethernet cable that  
4 connects the equipment to another device that  
5 allows engineers to gain access to the  
6 equipment.

7 Q. And you also said surveillance  
8 cables?

9 A. Same stuff. It's another  
10 Ethernet RJ45 cable that connects from the  
11 equipment to a different management box that  
12 will -- again, allows the engineers remote  
13 access into the device.

14 Q. And is that all that's involved  
15 in installing or deploying the equipment for  
16 engineers, or is there something else involved  
17 in that?

18 A. They would have to configure  
19 the surveillance system or the management  
20 system in order to accept the additional  
21 equipment cables. They would also supply IP  
22 addresses or, you know -- IP addresses to the  
23 equipment, and they have to do some basic  
24 configuration on the lab infrastructure to

1 ensure that it is set up properly to  
2 communicate with the technology devices.

3 Q. What's involved, in layperson's  
4 terms, in configuring the surveillance and  
5 management systems?

6 A. Just installing the system,  
7 powering it on and then logging on to it from  
8 a management console and configuring the  
9 device.

10 Q. And, again, what's actually  
11 involved in supplying an IP address to the  
12 equipment?

13 A. Going to a database -- we have  
14 a set range of IP addresses that are assigned  
15 to engineers or engineering teams within the  
16 lab. They would just go to a database that  
17 was created to track those and assign the  
18 next, you know, logical IP address for that  
19 engineering team.

20 Q. You also said that they do some  
21 basic configuration on the lab infrastructure  
22 to ensure that it's set up properly to  
23 communicate with the technology devices?

24 A. Yes.

1 Q. Again, if you can explain it to  
2 me in layperson's terms.

3 A. So in a lab, we have a set of  
4 devices that are used to connect lab equipment  
5 to the production network. That set of  
6 devices needs to be configured; how many ports  
7 we're using, what the card type is, what the  
8 speed of the ports are so that it matches up  
9 to the equipment that's being installed or  
10 accessed.

11 So if we have any problems  
12 where it's not configured properly -- we don't  
13 have the ports enabled, we don't have the card  
14 enabled -- we can't provide connections or  
15 service to the engineers.

16 Q. Currently, how many shipments  
17 are received on a weekly basis by the lab  
18 coordination team?

19 A. Offhand, a handful. Not a  
20 great deal. Approximately, I'll guess, three  
21 to five, at this point.

22 Q. You testified "at this point."  
23 Has it reduced over the course of the last few  
24 years?



1           A.       I think it's reduced  
2       dramatically since we moved into Warren when  
3       we first built -- when we were in the process  
4       of building the Warren lab, there were a lot  
5       of shipments and receiving coming in in order  
6       to get the lab built.

7                   Once we built the lab out, and  
8       we moved everyone in, it's really only as the  
9       engineers are certifying new technology. So,  
10      yes, it has -- has decreased.

11           Q.       When did the lab move to  
12      Warren?

13           A.       It started in late '05, 2005,  
14      and we completed it third quarter 2006.

15           Q.       Prior to moving to Warren,  
16      where was the lab located?

17           A.       There were labs located in  
18      various locations in Manhattan and one site in  
19      New Jersey.

20           Q.       Where was the Manhattan  
21      location?

22           A.       Manhattan was located at 388  
23      Greenwich Street, 111 Wall Street and 250 West  
24      Street. I think that's all of them.

1 Q. And you said there was a  
2 New Jersey location as well?

3 A. Yes.

4 Q. Where is that?

5 A. 745 -- it was at the Rutherford  
6 Data Center. They changed the name of the  
7 address, so...

8 Q. Was the purpose of the move to  
9 Warren to consolidate all of those labs?

10 A. Yes. It was to consolidate,  
11 provide a central lab facility for all the  
12 different engineering groups and to provide  
13 control over the labs.

14 Q. Prior to the move to Warren,  
15 how many engineers were working at the 388  
16 Greenwich Street facility?

17 A. I'll estimate there were 250 to  
18 300 engineers.

19 Q. And how about at the Wall  
20 Street location prior to the move to Warren?

21 A. That was a small setting. Ten.

22 Q. The West Street location?

23 A. A handful. Not a lot. Ten,  
24 15.

1 Q. And the Rutherford location?

2 A. Same thing, ten to 15. The  
3 majority were in Greenwich Street.

4 Q. And currently at the lab  
5 facility in Warren, how many engineers are  
6 employed?

7 A. I don't have exact numbers  
8 anymore.

9 Q. Can you estimate?

10 A. I would say there's still 250  
11 to 300 sitting out in Warren.

12 Q. Now, you said your current  
13 address is where?

14 A. Sixty-eight South Service Road  
15 in Melville, New York.

16 Q. Okay. So are you -- do some of  
17 your duties and responsibilities still relate  
18 to the Warren lab facility or no?

19 A. No.

20 Q. When did that end?

21 A. December 31st, 2007.

22 Q. Up until that point, were you  
23 actually located at the Warren lab facility?

24 A. No.

1 Q. You were still located in  
2 Melville?

3 A. Yes.

4 Q. At any point in time, were you  
5 located at the Warren lab facility?

6 A. No.

7 Q. So from the time it moved  
8 there, you said the move was complete the  
9 third quarter of 2006?

10 A. Yes.

11 Q. From the time it moved there,  
12 you've never been actually physically located  
13 for work at the lab facility?

14 A. We -- I would go out there once  
15 a week, once every couple of weeks just to  
16 check in with the lab team, as well as part of  
17 my other team that was sitting out in Warren,  
18 but I did not occupy a full-time spot in  
19 Warren.

20 Q. How long have you been in the  
21 Melville location?

22 A. A year and a half.

23 Q. And where were you located  
24 before that?

1 A. There was a site in Uniondale,  
2 Long Island, that we were sitting at.

3 Q. For how long were you located  
4 there?

5 A. I was there for about a year.

6 Q. And prior to that, where was  
7 your office?

8 A. 388 Greenwich.

9 Q. Was there a specific floor  
10 where your office was located?

11 A. Thirteen.

12 Q. And you just had one desk?

13 A. I had an office.

14 Q. You had an office?

15 A. Um-hum.

16 Q. And when did you -- when were  
17 you first located at the 388 Greenwich Street  
18 location?

19 A. I think in 1993.

20 Q. And was that always on the  
21 13th floor?

22 A. Yes.

23 Q. You testified that another  
24 responsibility of a lab coordinator currently

1 is unpacking equipment?

2 A. Um-hum, yes.

3 Q. That, I think we've gone over  
4 with respect to the receiving equipment part  
5 of it.

6 Is there anything else with  
7 respect to unpacking equipment that you  
8 haven't testified to?

9 A. No.

10 Q. You also testified that one of  
11 their responsibilities is installing  
12 equipment. Again, other than what you've  
13 testified to with respect to the installation,  
14 is there anything else that you left out  
15 there?

16 A. No.

17 Q. You testified that the lab  
18 coordinator also reviews requests to ensure  
19 that they're complete. What's involved with  
20 that?

21 A. The engineers would submit a  
22 lab request form. And on that request form,  
23 it would give a description of what the  
24 engineer was trying to accomplish, whether

1 that's installing new equipment, needs  
2 additional network connectivity, is changing  
3 speeds, anything related to his lab  
4 environment.

5 So the lab coordinators would  
6 review that and make sure that they could  
7 service or fulfill that requirement. And that  
8 included all the information that we need from  
9 a control compliance point of view.

10 Q. So those types of requests,  
11 would they include requests for new equipment?

12 A. Yes.

13 Q. And they'd include requests for  
14 changes to the environment that the engineer's  
15 working in?

16 A. Yes.

17 Q. Now, if you can explain to me  
18 the specific different types of requests that  
19 can be made, if you can break it down for me.

20 A. I would -- I would categorize  
21 it as three different types. One is for new  
22 installs. Second one would be to deinstall or  
23 remove equipment from the lab. Third would be  
24 to implement changes to existing environments

1 within the lab.

2 Q. Under the third category, can  
3 you tell me the types of changes to the  
4 existing environment?

5 A. Yeah. A couple of the changes  
6 could be if an engineer has a server  
7 installed, and it only has one network  
8 connection today, and they're going to upgrade  
9 that server, and it requires two, four or  
10 eight connections, the engineers would have to  
11 ensure that they've got the IP address, they  
12 have the port capacity, they have the cable  
13 capacity to make those additional connections.

14 Q. You just said that the  
15 engineers would have to ensure that they  
16 had --

17 A. I'm sorry, the lab  
18 coordinators.

19 Q. Lab coordinators?

20 A. Yes. Sorry about that.

21 Q. You also said that one of their  
22 functions was to talk to engineers to ensure  
23 that the scope and space at the Warren lab was  
24 sufficient for what they wanted to do.



1 If you can explain to me what  
2 that means in layperson's terms.

3 A. So if a engineer has a request  
4 that says, "I want to install Box A," the lab  
5 coordinators would review that request and  
6 say, "Okay. One, do we really understand what  
7 this is? Do we have the full dimension of the  
8 equipment listed here? How big is it?" You  
9 know, "What's the footprint that it's going to  
10 take up? Is it a standalone cabinet? Is it a  
11 rack-mountable device? What type of power  
12 does it need? Do we have to ask for any  
13 specific or special power requirements for  
14 that device? What type of network connections  
15 and management connections, and do we have all  
16 of the capacity that we need to service that  
17 request from the user?"

18 Q. Just to get back to the move to  
19 Warren, I think you testified that currently  
20 there's only a handful of shipments that come  
21 into the lab, about three to five per week.  
22 You said that that has been reduced  
23 dramatically since the move?

24 A. (Nodding.)

1 Q. During the period of the move  
2 from late 2005 to third quarter 2006, how many  
3 shipments would have been received at the  
4 Warren lab?

5 A. I don't have that answer. We  
6 tried doing them in bulk shipments so that  
7 when we were moving stuff from the city or  
8 Jersey into Warren, they packed it up on a  
9 Friday night. The movers came in, took  
10 everything and moved it in one shot.

11 But as the lab was being built,  
12 things were missed, things had to get shipped  
13 in, stuff had to get replaced, I don't have  
14 the exact numbers.

15 Q. And then after the move was  
16 complete, was there an immediate reduction, or  
17 did that take a while in terms of the number  
18 of shipments that were coming in?

19 A. As the phases were completed,  
20 it started to go down. If I only moved a  
21 small lab, not a lot of after -- after-moving  
22 shipments came in, but when we moved the big  
23 lab, like, 388 Greenwich, there was always  
24 some residual follow-up shipments that had to

1 come in.

2 Q. And how long did that go on  
3 for?

4 A. That probably went on for a  
5 couple months after the move.

6 Q. And when the equipment was  
7 received, were the lab coordinators  
8 responsible for installing the equipment?

9 A. Yes. I take that back. They  
10 were responsible, but because there was so  
11 much work going on at the time, we actually  
12 had some of the engineers doing the  
13 installations alongside of the lab  
14 coordinators in order to fulfill all of the  
15 work that had to get done.

16 Q. Is there currently a specific  
17 request form that's used for different types  
18 of requests from the engineers to the lab  
19 coordinators?

20 A. There is a lab request form  
21 that is used, and that could be used for any  
22 one of the requirements.

23 Q. So any of the three different  
24 types --

1 A. Yes.

2 Q. -- of requests you testified to  
3 earlier, you're using the same lab request  
4 form?

5 A. Yes.

6 Q. When was the lab request form  
7 created?

8 A. It was definitely created when  
9 we moved into Warren because that was one of  
10 the control pieces that we wanted to wrap  
11 around the Warren lab to keep -- keep it clean  
12 and pristine, if you will.

13 Q. At the 388 Greenwich Street  
14 site prior to the move, was there something  
15 similar to a lab request form or a different  
16 type of method for keeping track of the  
17 requests that would come from the engineers?

18 A. I'm not a hundred percent sure.  
19 I really didn't have a lot of ownership for it  
20 at that point in time, but I would assume  
21 that, you know, the lab coordinator role was  
22 in effect so that, you know, they would have  
23 been following similar processes.

24 Q. Is the lab request form an

1 electronic form, or is it a paper form?

2 A. It's electronic, and they could  
3 produce paper copies.

4 Q. And are all of the lab requests  
5 maintained in a database or some other form?

6 A. Yes.

7 Q. How long are they maintained  
8 for?

9 A. I'm aware that we were using  
10 them as part of -- once we got to Warren. So  
11 they should go back to at least March,  
12 February of '06.

13 Q. If you wanted to obtain that  
14 request form for the Warren lab, how would you  
15 go about doing that?

16 A. There is a -- do you want --  
17 excuse me. Do you want a brand-new request  
18 form in order to submit a request, or do you  
19 want to get copies of...

20 Q. For copies of old requests,  
21 say, going back to March of 2006. If you want  
22 to get copies of old requests, how would you  
23 go about doing that?

24 A. I would log on to the shared

1 server, go to the subdomain that was created  
2 for the Warren lab and look at the -- I  
3 believe it's the BAU file that handles all of  
4 the lab request forms that came in.

5 Q. Currently, how many lab request  
6 forms would be completed on a weekly basis at  
7 the Warren lab?

8 A. It depends what the nature of  
9 the requests are. If they're simple, you  
10 know, add one connection, you can do a lot of  
11 them. If it's installing and deploying  
12 equipment, new equipment, new power, you  
13 wouldn't get that many completed.

14 I think -- I believe the SLA  
15 is, you know, four-hour -- I think it's a  
16 four-hour turnaround time on a one-server  
17 install. That's based on log queue and  
18 everything else, so...

19 Q. You said, "SLA." What is that?

20 A. Service level agreement that  
21 we've implemented with the engineering teams  
22 in order to provide them, you know, some  
23 efficient or quality services so that they  
24 have an idea of how long it's going to take to

1 get something implemented.

2 Q. You're saying four hours would  
3 be the time that it would take to do what  
4 specifically?

5 A. That would be to implement and  
6 deploy one server with all of the network  
7 connections.

8 Q. So you testified, depending on  
9 the nature of the requests, the lab  
10 coordinator can get a certain number done in a  
11 brief period of time and others take a more  
12 significant period of time.

13 Can you give me an estimate of  
14 the average number of requests -- aside from  
15 what they can get done, the average number of  
16 requests that would come in on a weekly basis  
17 currently at the Warren lab?

18 A. Currently, I don't know since I  
19 haven't had responsibility for it for the last  
20 two months.

21 Again, prior to that, it could  
22 peak and flow depending on what's going on in  
23 the engineering space.

24 Q. So you said two -- I'm sorry,

1 were you finished?

2 A. Go ahead.

3 Q. You said two months ago you  
4 stopped having responsibility for that. Who  
5 currently has responsibility for it?

6 A. Yun Wang, Y-U-N W-A-N-G.

7 Q. And the last time you had  
8 responsibility two months ago, can you give me  
9 an estimate or an average of the number of  
10 requests that would come in a week?

11 A. I'll guesstimate. You know,  
12 five to seven.

13 Q. If you wanted to find out the  
14 number of requests, again, you could go to  
15 that database you referred to and you could  
16 find that information. Correct?

17 A. Yes.

18 Q. Other than having a lab request  
19 form going back to when the lab was at  
20 Greenwich Street, was there any other way of  
21 tracking requests from engineers to the lab  
22 coordinator?

23 A. They may have used e-mail.  
24 Again, I'm not a hundred percent sure, but,



1 again, I would think, you know, they were  
2 using similar processes that were put in place  
3 for Warren.

4 Q. You testified that another  
5 responsibility of the lab coordinators  
6 currently is inventory control?

7 A. Yes.

8 Q. Can you explain to me, in  
9 layperson's terms, what inventory control is?

10 A. Sure. What that means is, when  
11 equipment comes into the lab and they install  
12 it or they have to remove equipment, they go  
13 into a database and they update that database  
14 with the information.

15 If it's new equipment coming  
16 in, who requested it, what type of equipment,  
17 what's the value of the equipment and  
18 information like that, as well as the  
19 connectivity information.

20 And if they remove it, same  
21 thing; they pull it out and clear up the  
22 databases so that we can keep an accurate  
23 inventory of what's in the lab.

24 Q. What's the purpose of that?

1           A.       A couple of purposes. One is  
2     to adhere to an annual insurance questionnaire  
3     that we need to fill out in order to  
4     approximate how much dollar value is within  
5     the lab and if something happened to that lab,  
6     what it would take to replace all of that  
7     equipment.

8                   And the other key point is  
9     really to make sure we have capacity planning  
10    for the lab so that we know how much space is  
11    there, how much infrastructure is available,  
12    how much power we're using.

13                  And the third part is to be  
14    able to service and assist the engineers if  
15    something is breaking and they need help.

16           Q.       Now, are the lab coordinators  
17    responsible for troubleshooting with respect  
18    to the network?

19           A.       With respect to the core lab  
20    network -- there's two pieces to the network.  
21    There's -- on the left side, you got the  
22    production network. On the right side, you  
23    have the lab network. They are responsible  
24    for the lab network.

1 So they configure the network,  
2 they run the cables that connect the devices  
3 to that network. And if something isn't  
4 working, they will assist the engineers in  
5 figuring out what's wrong, reconfiguring the  
6 network, reconfiguring the management  
7 stations, replacing a cable, stuff like that.

8 Q. What's the difference between  
9 the production network and the lab network?

10 A. Lab network is, you know,  
11 strictly on the right side of a firewall,  
12 which is a device to keep the network safe so  
13 that we can't get viruses or bad programs from  
14 the lab out onto the production network. The  
15 production network is where Citigroup and its  
16 businesses transact their daily work.

17 Q. So the lab coordinators are  
18 responsible for troubleshooting the lab  
19 network only?

20 A. Yes.

21 Q. Is there anyone else involved  
22 in troubleshooting with respect to the lab  
23 network?

24 A. Some of the engineers would

1 assist, if needed.

2 Q. Anybody else?

3 A. Engineers, maybe the firewall  
4 ops team -- operations team.

5 Q. Is there a firewall ops team at  
6 the Warren lab facility?

7 A. No. It's centrally managed out  
8 of one location, and they keep changing it, so  
9 I really can't tell you exactly where.

10 Q. You also testified that the lab  
11 coordinators currently are responsible for  
12 keeping track of equipment and the value of  
13 equipment?

14 A. Um-hum.

15 Q. Other than what you just  
16 testified, is there anything else that's  
17 involved in doing that?

18 A. No.

19 Q. What do the lab coordinators  
20 currently spend most of their time doing?

21 A. Servicing the lab requests that  
22 come in from the engineers. So deploying new  
23 equipment, removing equipment, making changes.

24 Q. And do you consider

1 troubleshooting a separate category to those  
2 three?

3 A. Yeah, I would.

4 Q. And how much time would they  
5 currently spend troubleshooting?

6 A. If I had to estimate, I would  
7 say the first three I gave you, the  
8 implementing, the removing and the changing to  
9 the BAU request probably takes up 60 to  
10 70 percent of their time. Twenty percent to  
11 25 percent would be doing the inventory and  
12 database updates related to those requests.  
13 And the remainder would -- you know, five,  
14 ten, maybe 15 percent may be troubleshooting.

15 Q. You testified that another of  
16 their duties and responsibilities was  
17 providing connectivity to the engineers?

18 A. Um-hum.

19 Q. Is what -- did you already  
20 include in what you testified about that  
21 specific function?

22 A. Yes.

23 Q. Is there anything else involved  
24 in that that you haven't already testified to?

1 A. No, I testified to it.

2 Q. Now, the duties and  
3 responsibilities -- the current duties and  
4 responsibilities of the lab coordinator, were  
5 they the same duties and responsibilities at  
6 the time that the lab was located or at least  
7 one of the labs was located in Greenwich  
8 Street?

9 A. I believe they were. They were  
10 there to handle requests and service requests  
11 from the engineers. We may not have had as  
12 many of the capacity reports or the database  
13 reports built the way we do now, but, in  
14 spirit, it was the same, same sort of  
15 functionality.

16 Q. And during the course of the  
17 migration from the Greenwich Street facility  
18 to the Warren facility, were the duties and  
19 responsibilities of a lab coordinator any  
20 different to what they were at Greenwich  
21 Street or what they currently are at the  
22 Warren lab?

23 A. No.

24 Q. The insurance documentation

1 that you were testifying to, is that just done  
2 once a year?

3 A. Once a year.

4 Q. How long -- I'm sorry. Go  
5 ahead.

6 A. Annual insurance questionnaire.

7 Q. Now, who signs the insurance  
8 questionnaire, or does it need to be signed?

9 A. We turn that over to a COB, or  
10 continuity of business coordinator. We do not  
11 sign it; we just give them the information.

12 Q. And how long does it take to  
13 compile the information?

14 A. Now, with the processes that  
15 were put in place, after we got to Warren, it  
16 should be relatively quick because, as new  
17 BAUs come in, the value of that is estimated  
18 and put on a spreadsheet. So what we have to  
19 do is run a report against that spreadsheet,  
20 and I've got my total dollar number. So, now,  
21 I assume it should take an hour tops, you  
22 know.

23 Q. Prior to that system being  
24 implemented at Warren, do you know how long it

1 would take?

2 A. If someone needed to inventory  
3 and get in contact with all the engineers and  
4 figure out what that equipment was valued at,  
5 it could take a week to two weeks just based  
6 on sheer volume.

7 Q. I'm not sure if this question  
8 makes sense or not -- and I'm sure you'll be  
9 able to let me know -- but how many devices  
10 are currently at the Warren lab facility?

11 A. Between 900 and 1,000.

12 Q. And prior to the move of the  
13 lab from Greenwich Street, how many devices  
14 were at the lab at Greenwich Street?

15 A. Purely an estimate right now, I  
16 think there were about 400 devices at  
17 Greenwich.

18 Q. So it's almost doubled over the  
19 course of time from prior to the move to the  
20 current time?

21 A. It's doubled because we brought  
22 in the other labs. So the other four or five  
23 labs make up a lot of that other equipment  
24 that's there now, as well as we brought some



1 other departments' lab equipment into that  
2 lab.

3 Q. In terms of the duties and  
4 responsibilities of the lab coordinator that  
5 we've just gone through -- and I think that  
6 covered all of the different categories that  
7 you testified to earlier -- is there anything  
8 else that we haven't covered that the lab  
9 coordinator is currently responsible for?

10 A. Just to make sure, do they  
11 have -- did I put down configuration of the  
12 lab core equipment, the lab core network?

13 Q. You could have, but I can't  
14 read my writing.

15 A. Hate when that happens.

16 Q. Let's go over that.

17 You said configuration of the  
18 lab?

19 A. Core network.

20 Q. Core network. Can you explain  
21 to me what that is?

22 A. I think I did now that I  
23 recall, but, yes, again, in the lab, there is  
24 a set of devices that is used to connect all

1 of the engineer's test equipment to the  
2 production network.

3 Those devices -- Cisco  
4 switches, Cisco routers -- have to get  
5 configured with the proper cards, with the  
6 configuration files. They've got to load them  
7 up and bring them online and test them out.

8 MS. WALSH: Just off the record  
9 for a minute.

10 - - -

11 (Discussion off the record.)

12 - - -

13 (Recess 12:28-12:36 p.m.)

14 - - -

15 BY MS. WALSH:

16 Q. At some point in time,  
17 Mr. Millan reported to you in his job  
18 function. Is that correct?

19 A. Yes.

20 Q. When was that?

21 A. Specifically reporting to me  
22 would have been June, July of '06 through  
23 March '07.

24 Q. And did he report directly to

1 you as of June, July '06, or was there an  
2 intermediary?

3 A. That was directly.

4 Q. And prior to that, who did he  
5 report to?

6 A. Paul Holder, who reported to  
7 me. And that was summer of '05.

8 Q. And what was the reason for the  
9 change?

10 A. Paul decided to move out of the  
11 engineering group into a security role. And  
12 at that point in time, I decided to have the  
13 lab coordinators report directly to me.

14 Q. So nobody replaced Paul Holder  
15 in that position?

16 A. No.

17 Q. What was his title prior to the  
18 move into surveillance or security?

19 A. He was a senior network  
20 engineer, and his corporate title may have  
21 been classified as a manager.

22 Q. So he was reporting to you, and  
23 Mr. Millan was reporting to him?

24 A. Yes.

1 Q. From the summer of '05?

2 A. Mr. Millan was reporting to  
3 Paul prior to the summer of '05, but they  
4 moved Paul's team under me in the summer of  
5 '05.

6 Q. So from the summer of '05 to  
7 June, July '06, Mr. Millan was reporting to  
8 Mr. Holder who, in turn, was reporting to you?

9 A. Yes.

10 Q. What type of direct  
11 responsibilities, duties, if any, did you have  
12 over Mr. Millan during that time?

13 MS. BOUCHARD: During what  
14 time?

15 MS. WALSH: Summer of 2005 to  
16 June, July 2006.

17 THE WITNESS: Loose  
18 responsibility. I funneled most of my  
19 management stuff through Paul. The  
20 only specific thing I talked with  
21 Carmelo about was the lab migration  
22 project and stuff related to it.

23 BY MS. WALSH:

24 Q. Where was Mr. Millan's office

1 or desk located at the time?

2 A. He was at 388 Greenwich.

3 Q. Was the summer of '05 the first  
4 time that you met Mr. Millan or came in  
5 contact with him, or were you familiar with  
6 him prior to that?

7 A. That was the first time.

8 Q. With respect to the lab  
9 migration, can you tell me the specific  
10 interaction you would have with him?

11 A. Yeah, after that team was moved  
12 under me, I understood from Yesim that the  
13 migration was a major thing, and I needed to  
14 become familiar with it.

15 So I met with Paul and Carmelo  
16 to have them bring me up to speed with what  
17 was going on, where the project plan was and  
18 how we're doing on the project.

19 Q. What was Carmelo's role with  
20 respect to the lab migration?

21 A. It was his responsibility to  
22 handle the migration to Warren. It was his  
23 role to develop the plan, to work with the  
24 other engineering teams to make sure we

1 understood all the equipment that was going  
2 out there. He laid out or configured the  
3 Warren lab space and all the connectivity. It  
4 was his game to win. It was all his.

5 Q. So the first thing you said  
6 was, his role was to develop the plan. What  
7 was involved with that?

8 A. He was utilizing Microsoft  
9 Projects, I believe, to identify all of the  
10 major deliverables and all of the tasks  
11 associated with those deliverables, what the  
12 start/end dates were, what their current  
13 status comments were and who owned the  
14 responsibility.

15 Q. When you say, "major  
16 deliverables," is that the delivery of the  
17 equipment out to Warren?

18 A. It could have been broken into  
19 a few different things such as equipment  
20 inventory, shipping and receiving of equipment  
21 from the labs to Warren. Floor layout --  
22 floor diagrams, floor layouts for the cabinet  
23 or the infrastructure within Warren, the  
24 connectivity to's and from's or the

1 interconnections of all of their pieces of  
2 equipment within the Warren lab.

3 Q. Did he do the floor layouts and  
4 floor diagrams, or did somebody else do those?

5 A. I believe he did those. He may  
6 have had help from one other team.

7 Q. Which team was that?

8 A. That would have been the data  
9 center planning team, we call it -- or we  
10 called it at that point in time.

11 Q. Were they engineers or --

12 A. They were engineers, but they  
13 did not report to Yesim; they were a separate  
14 organization.

15 Q. So aside from developing the  
16 plan for the move, which you just testified  
17 about, you said to work with the other  
18 engineering teams.

19 What was involved specifically  
20 in Mr. Millan working with other engineering  
21 teams as it related to the move to Warren?

22 A. That would have been to ensure  
23 that he gets a coordinator assigned from the  
24 other team.

1 Q. Which other team?

2 A. Any of the engineering teams,  
3 you know.

4 Q. So there was a coordinator for  
5 each of the engineering teams that was kind of  
6 assigned to cover the move to Warren?

7 A. Yes, to work with Carmelo on  
8 the move to Warren.

9 Q. So he had to ensure he had a  
10 coordinator from each of those teams to work  
11 with him?

12 A. They would get a coordinator,  
13 they would supply the current inventory of the  
14 labs, Carmelo would review the inventory, pose  
15 questions back to engineers if something was  
16 missing, make sure he had all the information  
17 he needed so that when that equipment showed  
18 up in Warren, he knew where it belonged, who  
19 it goes to, what connections, what power, all  
20 that stuff that we've talked about.

21 Q. So he would get that inventory  
22 from the coordinator from each of the  
23 different engineering teams?

24 A. Yes. Let me just clarify that.



1 From the -- from the remote -- the 250 West,  
2 the 111 Wall and Rutherford labs, the 388  
3 Greenwich lab, he had responsibility for that  
4 inventory and everything there.

5 Q. You also said that he was  
6 responsible for laying out or configuring the  
7 Warren lab space and all connectivity?

8 A. Yes.

9 Q. Can you tell me, in layperson's  
10 terms, what that involved?

11 A. Yup. So you have a room like  
12 this, he's going to figure out where the  
13 cabinets get placed in the room. He's going  
14 to figure out what equipment goes in what  
15 cabinet and what cable connectivity has to  
16 come back from that equipment to the main  
17 central patching frame.

18 Q. Did he determine where people  
19 were going to sit?

20 A. He determined where the  
21 equipment would go in the cabinets. There  
22 were no people out there.

23 Q. Just what you testified to with  
24 respect to the Warren lab migration and

1 Mr. Millan's job responsibilities with respect  
2 to that, anything else that he had  
3 responsibility for that you haven't testified  
4 to?

5 A. Assembling the equipment  
6 purchases. And what that entailed was making  
7 sure that we had all the equipment we needed  
8 in order to build out the Warren lab.

9 So identifying how many  
10 cabinets, how many shelves, what type of  
11 cables, how much core infrastructure equipment  
12 was needed, whether they were routers,  
13 switches, management platforms, stuff of that  
14 nature, tools that you could use.

15 Q. Anything else?

16 A. I think that's it for the  
17 migration.

18 Q. Now, during the migration, was  
19 Mr. Ibrahim already an employee within that  
20 department?

21 A. Yes.

22 Q. Did he -- was he responsible  
23 for any -- or did he perform any of the duties  
24 and responsibilities with respect to the

1 Warren lab migration that you just testified  
2 to?

3 A. For the most part, it was  
4 Carmelo. Naseer was hired, again, in March or  
5 April of '05, so he was pretty new. And  
6 Carmelo was actually, you know, training and  
7 giving him some oversight as to how the lab  
8 works, what to do, how to handle a request.

9 Q. Did Naseer report to -- did  
10 Mr. Ibrahim report to Mr. Millan?

11 A. Not officially, no.

12 Q. Who did he report to?

13 A. Initially, to Paul. And then  
14 in June, July of '06, through '07, they both  
15 reported to me.

16 Q. Did Mr. Millan have any hiring  
17 responsibilities?

18 A. Not that I'm aware of.

19 Q. Did he -- sorry.

20 A. Go ahead.

21 Q. Did he have the power to  
22 discipline an employee?

23 A. Not from the time they came  
24 under my management control, no.

1 Q. Before that, did he have that  
2 responsibility?

3 A. Not that I'm aware of.

4 Q. Could he fire an employee?

5 A. I don't believe so.

6 Q. Was he considered a manager?

7 A. I believe he was considered an  
8 engineer or an analyst.

9 Q. Prior to you taking direct  
10 managerial responsibility for Mr. Millan, who  
11 was responsible for completing employment  
12 evaluations for him?

13 A. Paul Holder. Again, from when  
14 I took responsibility in '05, Paul did the  
15 performance review for '05, Paul did the  
16 midyear review in '06, and I did year-end in  
17 '07 -- I mean, in '06.

18 Q. When Paul had the  
19 responsibility for doing the reviews midyear,  
20 year-end reviews, did you have any input with  
21 respect to those reviews?

22 A. Yes, I did.

23 Q. What was your input?

24 A. Just making sure I agreed with

1 what Paul put down, if I noticed any  
2 improvement areas that would benefit Carmelo  
3 or anyone else. So time management, project  
4 management, classes, you know, recommended  
5 that he take a few of those.

6 Q. Was there a reason specifically  
7 that you recommended that he take a  
8 time-management class?

9 A. Primarily just -- we like to  
10 have all of the engineers run through that so  
11 that they get a better understanding of how to  
12 do time management as it relates to all the  
13 projects that come in. We have a lot of work  
14 that comes in, and you really have to figure  
15 out how to handle the load.

16 Q. At the time Mr. Millan started  
17 reporting to you directly, how many hours per  
18 week was he working?

19 A. I would -- based on the reports  
20 that I eventually started pulling in August  
21 and I believe October, I would think, you  
22 know, from what I saw, he was working 35,  
23 37 hours a week.

24 Q. And that was from June 2006?